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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION, This document relates to: ALL ACTIONS	CASE NO. 3:18-MD-02843-VC **[PROPOSED] ORDER REGARDING SEARCH STRINGS**

[PROPOSED] ORDER

Having considered the Parties' submissions regarding the search strings to be applied to the 38 custodians in Custodian Groups 1-4 (*see* Dkt. 461), IT IS HEREBY ORDERED as follows:

☐ Facebook's October 16, 2020 Proposal, attached as **Exhibit A** to the October 24, 2016 Declaration of Martie Kutscher in Support of Facebook's Corrected Request to Approve Search String Proposal For Custodian Groups 1-4 ("Kutscher Declaration") shall be adopted in full for the 38 custodians in Custodian Groups 1-4;

or

☐ The agreed-upon search strings as set out in **Exhibit B** to the Kutscher Declaration shall be adopted for the 38 custodians in Custodian Groups 1-4 in addition to the following:

Strings proposed by Facebook for which the Parties submit competing versions		
FB - 12	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
FB - 20	Facebook's Proposal ☐	Plaintiffs' Proposal ☐

Strings proposed by Plaintiffs for which the Parties submit competing versions		
P-236	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
P-273	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
P-290	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
P-426	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
P-466	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
P-501	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
P-524	Facebook's Proposal ☐	Plaintiffs' Proposal ☐
P-669	Facebook's Proposal ☐	Plaintiffs' Proposal ☐

Strings proposed by Plaintiffs that Facebook asks the Court to reject in full		
P-41	Do Not Include ☐	Include ☐
P-117	Do Not Include ☐	Include ☐

[PROPOSED] ORDER
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Gibson, Dunn & Crutcher LLP

P-118	Do Not Include	☐	Include	☐
P-194	Do Not Include	☐	Include	☐
P-216	Do Not Include	☐	Include	☐
P-223	Do Not Include	☐	Include	☐
P-224	Do Not Include	☐	Include	☐
P-244	Do Not Include	☐	Include	☐
P-313	Do Not Include	☐	Include	☐
P-422	Do Not Include	☐	Include	☐
P-467	Do Not Include	☐	Include	☐
P-481	Do Not Include	☐	Include	☐
P-673	Do Not Include	☐	Include	☐

The Court expects the search strings approved in this Order to serve as a starting point for the Parties' negotiations of the search strings to apply to the remaining 43 custodians.

IT IS SO ORDERED.

DATE: _____   _____

United States Magistrate Judge Jacqueline Corley

[PROPOSED] ORDER
CASE NO. 3:18-CV-01732-VC